

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

v.

NATHAN MILLER DOBBELMANN

FILED UNDER SEAL

Case No. 21-MJ-247 (DTS)

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Matthew Vogel, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the United States Department of Justice, Federal Bureau of Investigation (FBI), and have been so employed since July 2010. I am currently assigned to the Minneapolis Division, Squad C-4 and the Minnesota Child Exploitation Task Force, where my investigative responsibilities include investigation of child sexual abuse and exploitation crimes such as production, possession, receipt, and distribution of child pornography. I have gained knowledge and experience through training at the FBI Academy, in service training, and everyday work in conducting these types of investigations. I have received training in the area of child pornography and child exploitation investigations and have reviewed numerous examples of child pornography as defined at 18 U.S.C. § 2256, in various forms of media, including computer media.

2. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), and am empowered by 18 U.S.C §§ 3052 and 3107 to conduct investigations of, and to make arrests for, violations of federal criminal statutes.

PURPOSE OF AFFIDAVIT

3. I make this affidavit in support of an application for a Criminal Complaint charging NATHAN MILLER DOBBELMANN (DOB XX/XX/1981¹) a/k/a awesomedaddy1981, iliverichously, ilivearichouslife, and extremepussypleaser (hereinafter DOBBELMANN) with Production of Child Pornography and Attempted Production of Child Pornography pursuant to 18 U.S.C. §§ 2251(a) and (e), Distribution of Child Pornography pursuant to 18 U.S.C. §§ 2252(a)(2) and (b)(1), Transfer of Obscene Material to a Minor pursuant to 18 U.S.C. § 1470, and Penalties for Registered Sex Offenders pursuant to 18 U.S.C. § 2260A. My investigation to date shows that between at least December 1, 2019, and January 15, 2021, DOBBELMANN, a person required by law to register as a sex offender, used, persuaded, coerced, and enticed minors to produce and send sexually-explicit images that constitute child pornography as defined at 18 U.S.C. § 2256 and attempted to do so. DOBBELMANN also solicited and received child pornography from such minors and distributed sexually-explicit images of minors to an undercover federal law enforcement officer in September 2020. Specifically:

- a) Between on or about March 22, 2020, through on or about May 1, 2020, in the District of Minnesota and elsewhere, NATHAN MILLER DOBBELMANN

¹ Per local rules of this court and 18 U.S.C. § 3509, I have partially redacted personally identifying information, such as dates of birth, from this affidavit. Unless otherwise noted, the complete data are known to me and available to the Court.

attempted to and did employ, use, persuade, induce, entice, and coerce MINOR VICTIM 1 (self-identified as 15 years of age) to engage in sexually-explicit conduct for the purpose of producing a visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, and that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer. Specifically, on or about May 1, 2020, —at DOBBELMANN’s direction— MINOR VICTIM 1 sent a computer file identified as “chat~media_v4~2020-05-01-20-32-42UTC~[MINOR VICTIM 1’s account ID]~iliverichously~saved~b~EiQSFUVTQTIwYzU2WIVEelBrS1A5ZFNmNxoAGgAyAXxIAIAEYAE~v4.jpeg”² to DOBBELMANN’s account. The file is an image depicting the anus and vagina of an individual purported to be MINOR VICTIM 1. This conduct constitutes count 1 of the complaint.

- b) Between on or about September 13, 2020, through at least on or about October 30, 2020, in the District of Minnesota and elsewhere, NATHAN MILLER DOBBELMANN attempted to and did employ, use, persuade, induce, entice, and

² I have partially redacted file names where they contain information which tends to identify a minor victim.

coerce MINOR VICTIM 2 (date of birth XX/XX/2008) to engage in sexually-explicit conduct for the purpose of producing a visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, and that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer. Specifically, on or about October 30, 2020, —at DOBBELMANN’s direction— Minor 2 sent a computer file identified as “chat~media_v4~2020-10-30-21-28-19UTC~[MINOR VICTIM 2’s account ID]~iliverichously~saved~b~EiQSFXRqUXJtZUdHV2RkcGpZcGpVRW9iVxoAGgAyAQFIAIAEYAE~v4.jpeg” to DOBBELMANN’S account. The file is an image depicting the anus and vagina of an individual purported to be MINOR VICTIM 2. This conduct constitutes count 2 of the complaint.

- c) On or about September 23, 2020, in the District of Minnesota and elsewhere NATHAN MILLER DOBBELMANN did knowingly distribute a visual depiction using a means or facility of interstate or foreign commerce, or which was shipped or transported in or affecting interstate or foreign commerce, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually-explicit conduct, and such visual depiction is of such conduct, to wit, a computer file identified as FQTRXXXX.MP4. The file

is a video approximately six minutes and six seconds in duration and depicts MINOR VICTIM 3, an identified minor victim, in poses of sexually explicit nudity and masturbating. DOBBELMANN distributed the file via an Internet application hosted in a foreign place to an undercover FBI Special Agent located in the state of Utah. This conduct constitutes count 3 of the complaint.

- d) On or about August 11, 2020, in the District of Minnesota and elsewhere NATHAN MILLER DOBBELMANN knowingly attempted to and did transfer an obscene matter to another individual who had not attained the age of 16 years, knowing that such other individual had not attained the age of 16 years, to wit, an computer file identified as chat~media_v4~2020-08-11-12-46-28UTC~iliverichously~[MINOR VICTIM 4's account ID]~saved~b~EiQSFUFiME9GWXhHZ290ODBIU2dheGVpeRoAGgAyAQRIA1AEYAE~v4.jpeg. The file is an image depicting an erect adult penis which DOBBELMANN sent after MINOR VICTIM 4 told DOBBELMANN she was eleven years of age. This conduct constitutes count 4 of the complaint.

- e) At all times relevant to the proposed Criminal Complaint NATHAN MILLER DOBBELMANN was a person required by Federal or other law to register as a sex offender and did commit one or more felony offenses involving a minor under sections enumerated in 18 U.S.C. § 2260A. This conduct constitutes count 5 of the complaint.

4. The facts set forth in this affidavit come from my personal observations, my training and experience, evidence gathered pursuant to search warrants and subpoenas, and information obtained from other law enforcement officers and witnesses. Because this affidavit is submitted for the limited purpose of securing a Criminal Complaint, it does not include every fact known to me or to other investigators.

PROBABLE CAUSE

BACKGROUND OF THE INVESTIGATION

5. Beginning on or about August 28, 2020, a certified online undercover (UC) FBI Special Agent located in Salt Lake City, Utah accessed a chat room on SERVICE 1³. The UC made video recordings and took screenshots of online activity, which I have reviewed. The chat room was titled, “pizzalinksvideosCP/ XXXXXXphotos.” From my training and experience, I know that the term “pizza” and “cheese pizza” are frequently used by child pornographers to refer to child pornography. The term “links” in this context refers to web links to cloud file storage sites, a common way of trading large quantities of

³ I am aware that some child pornographers review public records regarding child pornography investigations, and may use file names, email addresses, telephone numbers, and information about electronic service providers found in such records to help them locate child pornography, others with a sexual interest in children, or contacts and accounts to avoid while trading child pornography. I have partially anonymized such information for accounts relevant to this application that are not the subject of this application. Unless otherwise noted, the complete information is known to me and available to the Court. Accounts that have been closed or are the subject of court filings are left unredacted because they were necessarily part of such filings.

child sexual abuse images and videos. Likewise, in my training and experience, I am aware the use of the letters “CP” simply refers to the initials of the term “child pornography.” The description states, “Share links videos! Welcome pidough⁴.” The term “pidough” is likely an allusion to the term “pedo,” meaning pedophile.

6. At approximately 2:40 AM—prior to the UC’s entry in the chat room—a chatroom participant posted a link to a foreign-based cloud file hosting service. The UC accessed the link and found that it directed to a folder titled, “MP4.” The folder contained 6.93 GB of data in 746 files. The files primarily consisted of videos depicting the rape and other sexual assaults of prepubescent children. Some of the children depicted are very young, including apparent toddlers. I am aware from unrelated investigations that this folder was originally created by an account based in Sweden.

7. On or about August 29, 2020, another chatroom participant—believed to be an identified individual located in New York state—posted a set of eleven links to the foreign cloud hosting service, a domestic file hosting service, and another chat platform. I am aware from the ongoing investigation of this identified individual that at least some of these links directed to then-active⁵ folders containing hundreds of child pornography files.

⁴ I have included Internet-based messages in quotes verbatim including typographical errors and abbreviations.

⁵ The contents of these folders have since been removed by the service provider due to their illegal content.

8. In addition to the aforementioned files, the chatroom contained several other links to child pornography folders as well as in-line images and videos depicting child pornography that were viewable to all 165 participants in the chat. One of the chat participants used the screen name ILIVERICHOUSLY. The individual's profile picture shows an adult male holding his erect penis. The individual's face is partially visible and is visually similar to known images of DOBBELMANN.

9. On or about September 6, 2020, the UC sent the following direct message to ILIVERICHOUSLY:

I'm a perv Bi dad with a yung kids, no limit USA, looking for other parents,
hbu⁶? HMU⁷ on Kik @XXXXXXXXXX

10. In response to the UC's message, the following chat took place between on or about September 6 and on or about September 23, 2020:

ILIVERICHOUSLY: Hey! Nice to hear from you! How many girls & how many boys you got? How old are the girls?

UC: 9 yo dau, 5 yo step son, U have kik?

ILIVERICHOUSLY: Can I see some pictures/videos of them in past play?
Does mom play too?

UC: Gf does but she's not into it like me

⁶ A common chat abbreviation for "How 'bout you?"

⁷ A common chat abbreviation for "Hit me up"

ILIVERICHOUSLY: How old are you two. I AM 39 SINGLE KINDAI am still married to my wife but have not been together in 5years

UC: I'm 35, live in Utah USA, hbu?

ILIVERICHOUSLY: But she knows that you do it and is ok with it??Is the girl hers or yours with a different girl? You all live together? I am from Minnesota USA

UC: Girl is mine boy is hers, u have Kik? Mine is XXXXXXXXX

ILIVERICHOUSLY: I see. Where is the girls mom does mom play with her daughter too or does she even know ABOUT IT? AND STILL wondering does your current know about it and llay with ever too?

UC: Well I first shared my thoughts about yung and involving her in fantasy. Made subtle comments about my dau, looked at some cp etc

UC: It's been a process. She doesn't know I play with her but likes the idea. Just being careful

UC: Rather not say too much more. I've been burned a lot on [foreign-based chat application]. Lots of fakes and cops. U got Kik?

ILIVERICHOUSLY: In driving.... hard to type R*N sorry..would your current be OK with another adult(me) joining in with you&her and work the daughter in with us and then athen maybe the son see how it goes? Lets see pictures and videos of you daughter, gf etc &in return I will send back the

same number of myself for you!!.[* I'll download it now, brb. Here are a few pix of me. Here are a bunch if me for you so i hope you trust a bit more

ILIVERICHOUSLY: [Several images sent depicting what appears likely to be adult pornography, adult penis images, and images containing sexually explicit text. Within some of the images are Snapchat QR⁸ codes and other potentially identifying information including the following image (redacted to remove sexually explicit content and certain information pursuant to local rules of this court):

⁸ A QR or Quick Response code is a type of matrix barcode. It is machine-readable and in this context usually contains encoded information directing to a website or specific account on a communications application. Due to the need to redact sexually explicit content in the image shown herein, portions of the QR code were covered meaning an attempt to search on the code as shown in the redacted image will not succeed. A Snapchat QR code would be expected to direct a scanner to a specific Snapchat account.



UC: This is adult porn lol. I'm looking for OC⁹, other parents or a partner

ILIVERICHOUSLY: This is me having sex with some girls lol, 1 my xwife
the other 2 were .9

ILIVERICHOUSLY: [Video file sent depicting the anal rape of an apparent
minor female by an adult male.]

ILIVERICHOUSLY: [Sent a video file marked as BKBGXXXX.mp4. The
video is approximately 4 minutes, 15 seconds in duration and depicts a nude

⁹ A commonly used abbreviation for “original content.”

prepubescent female in poses of sexually explicit nudity including depictions of the child spreading her legs expose her vagina.]

ILIVERICHOUSLY: [Sent a video file identified as FQTRXXXX.MP4. The video is approximately 6 minutes, 6 seconds in duration and depicts MINOR VICTIM 3 removing her clothes, in poses of sexually explicit nudity, and masturbating.]

ILIVERICHOUSLY: You like? Send some good ones back too please

UC: U got Kik? Mine is [UC provided Kik name]

ILIVERICHOUSLY: Yes mine is extremepussypleaser

UC: cool

ILIVERICHOUSLY: lets see some here of your girls 1st please

11. On or about September 23, 2020, the UC received a message on a UC controlled Kik account. The message read, "He this is iliverichously on [SERVICE 1] whatcha got to share with me?" The two then engaged in the following chat:

UC: Are u a parent?

EXTREMEPUSSYPLEASER: Lol yes

UC: Wat ages?

EXTREMEPUSSYPLEASER: 11, 9 and 6¹⁰ You??

¹⁰ Based on information contained in police reports regarding allegations of domestic abuse, DOBBELMANN has at least three children of approximately the stated ages. On at least

UC: 9 yo dau and 5 yo step son, they with u now?

EXTREMEPUSSYPLEASER: Oh yea..gotcha...no the are with their mothers parents....could I see some sexy pictures and videos of your daughter???

UC: Let me know when ur with them

EXTREMEPUSSYPLEASER: I don't play with my boys tho. Just girls, I got shit to share of girls if you share too. Its your turn now to share your daughtes sexy naked pictures&videos with me RN finally.

12. The UC captured EXTREMEPUSSYPLEASER's profile information which included the display name "NoExpectationsNoLimitations snap@awesomedaddy198." The account showed it had been in existence for 990 days. The account's profile pictures included images of at least one individual's erect apparent adult penis and images depicting a partial face¹¹. The individual depicted in the partial face image is visually similar to known images of DOBBELMANN.

13. DOBBELMANN is subject to registration requirements of the Minnesota Predatory Offender Registry (POR). According to his criminal history and information on the POR, DOBBELMANN was arrested in 2007 for attempted 3rd Degree Criminal Sexual

one occasion, DOBBELMANN was accused of showing pornography to at least one child. No charges relating to that allegation were filed.

¹¹ The image is distinct from that on the ILIVERICHOUSLY profile, but similar in nature.

Conduct. The case resolved by guilty plea to a count of gross misdemeanor distribution of obscene material to a minor in violation of Minnesota law. I reviewed the investigative file associated with the conviction and learned that DOBBELMANN was a Winona County Detention Deputy at the time of the offense. According to police reports, DOBBELMANN told the minors¹² he solicited about his employment position. In brief summary, the investigative file documents that DOBBELMANN contacted at least two minor females online and sent them sexually explicit material. DOBBELMANN asked the minors for a “threesome.” DOBBELMANN wrote, “You and [the seventeen year old] wanna have a threesome with me?” and “But don’t you wanna get together with me and have a threesome? you wanna trade pix?” Discussing the sex with a child her age, DOBBELMANN wrote, “Its way illegal...and no one could know...”

14. DOBBELMANN also has at least one felony conviction for Failure to Register/Providing False Registration Information on the POR, and prior arrests for violent incidents in which he used property he obtained in the course of his employment with the Winona County Sheriff’s Office.

15. More recently, DOBBELMANN has been under investigation by the Minnesota Bureau of Criminal Apprehension (BCA) for child pornography offenses. On or about September 12, 2019, DOBBELMANN’s residence was searched pursuant to a Hennepin County search warrant. The BCA seized electronic devices that are being

¹² One of the minors was seventeen, the other was fifteen at the time.

forensically examined. DOBBELMANN was arrested and booked, but has not yet been charged.

16. Finally, on or about August 23, 2020, DOBBELMANN was arrested in Saint Paul, Minnesota for failure to register as a predatory offender. DOBBELMANN was booked, but has not yet been charged. Following his release, DOBBELMANN updated his POR registry to reflect a current address and phone number. The updated phone number is the same as the number ILIVERICHOUSLY used on the image sent to the UC and shown above in paragraph 10 (XXX-XXX-2498).

17. The FBI served administrative subpoenas on MediaLab.ai—owner of the Kik messenger service—for subscriber and registration records associated with the EXTREMEPUSSYPLEASER Kik account. In response, MediaLab.ai provided records showing that the account was registered with the following information:

First Name: NoExpectationsNoLimitations
Last Name: snap@awesomedaddy198
Email: awesomedaddy1981@yahoo.com (confirmed)

From my training and experience, I know that the “(confirmed)” after the registration email address means that the user responded to a verification or authentication message sent to that email account. This means that the user very likely has access to the email account and likely controls it. The account showed access from IP addresses assigned to CenturyLink.

18. The FBI served an administrative subpoena on Oath Holdings, Inc. for registration information associated with awesomedaddy1981@yahoo.com. Oath Holdings,

Inc.'s records reflect the same confirmed phone number posted by the user of the EXTREMEPUSSYPLEASER Kik account and listed on DOBBELMANN's POR.

19. Using only publicly available information, I found several accounts relevant to the offenses under investigation associated with awesomedaddy1981@yahoo.com. These include accounts on Tango, Skype, and Dropbox, all services commonly used by child pornographers and persons seeking to communicate about, acquire, and trade child sexual abuse imagery. Sexually explicit adult images were publicly available as profile pictures for the Tango account and a Google account associated with awesomedaddy1981@yahoo.com.¹³ The publicly available profile image for the Skype account consisted of a scan code directing to a Kik Messenger account. A LinkedIn profile associated with awesomedaddy1981@yahoo.com had a publicly available profile picture of an individual visually similar to DOBBELMANN with his erect penis in the foreground. The LinkedIn username was "Awesomedaddy Photography" offering photography services in the "Greater Minneapolis-St. Paul Area."

¹³ This indicates a Google account was created to access certain Google services other than email. In my training and experience, this is usually done by users who wish to register an Android mobile device using a non-Google email account.



LinkedIn Profile Image



Minnesota Driver License Image (June 11, 2019)

20. Similarly, I found relevant accounts associated with email address ilivearichouslife@gmail.com. These include Skype, Venmo, and Dropbox. Similar to accounts associated with awesomedaddy1981@yahoo.com, ilivearichouslife@gmail.com had a LinkedIn profile for “Nathan D., Nude Photographer at AwesomeDaddy Photography” in Minneapolis, Minnesota.

21. The FBI served an administrative subpoena on Google, LLC for information associated with ilivearichouslife@gmail.com. Google, LLC records show the name on the account is “Nathan D.” The account was created on September 14, 2019, and accessed from the same CenturyLink IP address as that used to access the EXTREMEPUSSYPLEASER Kik account and awesomedaddy1981@yahoo.com.

22. The FBI served an administrative subpoena to CenturyLink for subscriber information associated with login IPs associated with the above-mentioned email

addresses. Login IPs were assigned to an individual¹⁴ at the address listed on DOBBELMANN's POR. This is the same address he provided when he updated his POR information after his August 2020 arrest in Saint Paul.

SEARCHES OF INTERNET COMMUNICATIONS ACCOUNTS

KIK

23. On or about November 4, 2020, I applied for and was granted a search warrant in District of Minnesota case 20-MJ-810(BRT) for content associated with Kik account extremepussypleaser. The records produced in response to that search warrant included several images of DOBBELMANN masturbating or holding his penis and references to his Snapchat account and phone number. The records also included several abuse reports by other Kik users against extremepussypleaser. Many of the reports involve extremepussypleaser (apparently unsuccessfully) requesting sexually explicit images from other users, including at least one user which told extremepussypleaser she was 13. On or about December 2, 2018—after the reporting account told extremepussypleaser she was 13—he wrote:

Or u can send your naked pix and clips back or even meet up to give that sweet tight virgin pussy a treat and have me fill it up for the 1st time with my 10 inch hard cock filling it up with loads of my cum and the most amazingly pleasurable feelings pulsating thru your entire body for many hrs as you use me and my cock to experiment with sexy and trying all your firsts to with me to make them great.

¹⁴ The CenturyLink account is not in DOBBELMANN's name. According to Hennepin County property records, the subscriber is listed as the homeowner for the 2020 tax year.

24. On or about August 2, 2018, at 5:21:42 AM, a Kik user reported a conversation in which extremepussypleaser wrote, "Hey there beautiful [Name Redacted]! I got your KIK from live.me. Can you send me sum your sexy pictures?[...] Let's see your sexy ass n pussy girl."

25. As of on or about November 10, 2020, the reporting Kik account ID in paragraph 24 above was listed on the public profile of a LiveMe profile. The profile's description states, "[Name Redacted] im 15 I am a varsity cheerleader..."

SNAPCHAT ACCOUNTS

26. On or about November 4, 2020, I applied for and was granted a search warrant in District of Minnesota case 20-MJ-811(BRT) for content associated with Snapchat accounts awesomedaddy198 and iliverichously. In my review of the responsive records, I observed the following information: The awesomedaddy198 account was created in May 2016, but aside from use logs and friends lists, the responsive records were limited to a relatively small number of incoming chat messages between April 2020 and October 2020. The iliverichously account contained a very large number of images and chat logs.

27. Chats included approximately 16,407 unique messages to and from the account. Significant attribution evidence existed within the account including multiple uses of DOBBELMANN's name, location, image, and contacts with old friends and his ex-wife. Subscriber information shows the account is associated with the phone number listed on DOBBELMANN's POR. The account contained hundreds of copies of a set of images

depicting DOBBELMANN masturbating, holding his erect penis, or in poses of sexually explicit nudity.

28. The iliverichously account was almost exclusively dedicated to sexually explicit communications. DOBBELMANN sent messages to dozens of accounts that purported to belong to minors as young as eleven. DOBBELMANN often pretended to be younger than his true age, but appears to have generally sent pictures of himself when interacting with others. DOBBELMANN frequently asked those with whom he chatted about their age, sexual experience, and interest in watching DOBBELMANN masturbate. DOBBELMANN wrote to one chat participant, “[...]I don't get myself off ever unless its for a girl to see or watch so I got a lot of pix.” Some of the chat participants explicitly reported their age while others provided context clues such as discussion about school or their parents’ restrictions on activities.

MINOR VICTIM 1

29. On or about March 22, 2020, DOBBELMANN contacted MINOR VICTIM 1. DOBBELMANN told MINOR VICTIM 1 he was nineteen. DOBBELMANN sent an image of what appears to be his erect penis and wrote, “You like?” MINOR VICTIM 1 replied, “No I don’t.” DOBBELMANN continued sending images of his penis to MINOR VICTIM 1 and called her “babygirl.” DOBBELMANN suggested that she call him “Awesome Daddy.” The following day, MINOR VICTIM 1 wrote, “You are ah old man. Don’t you got ah gf or wife you can be doing that to?[...]Your like 40 years old I’m 15 😬.” On or about April 13, 2020, DOBBELMANN apparently tried to call MINOR

VICTIM 1. DOBBELMANN asked, “why u hang up right away?” MINOR VICTIM 1 replied, “bc ur weird asf like leave me alone fucking child molester.”

30. DOBBELMANN persisted in his attempts to seduce MINOR VICTIM 1 for several days until on or about April 24, 2020, when he offered MINOR VICTIM 1 “an 8ball”—likely referring to narcotics. MINOR VICTIM 1 replied, “get me food.” In reply, DOBBELMANN wrote, “Sure if ya send me some sexy naked pix&vids of yourself I'll buy you sum food no prob!” MINOR VICTIM 1 replied, “fr”—meaning “for real?” DOBBELMANN replied, “Yea 🍑 Fr. I love to help out any of my girl friends whenever I can if they also help me out and send me any&all their sexy naked pix and videos whenever I ask & randomly whenever they take any new ones...” MINOR VICTIM 1 asked for food from a specific Mexican restaurant and DOBBELMANN replied, “So yea that's fine beautiful! Go ahead and send me all the sexy naked pix&vids ya got and can take for me RN till your food arrives and tell me exactly whatcha want and the address to send it to.” MINOR VICTIM 1 provided her full name, phone number, and address in Ohio. MINOR VICTIM 1 then sent a series of sexually suggestive images.

31. DOBBELMANN sent MINOR VICTIM 1 a screenshot of the food order confirmation. A portion of the screenshot shows DOBBELMANN was using Google Maps to navigate through Inver Grove Heights, Minnesota at the time. DOBBELMANN then wrote, “So send your sexy naked beauty right away now please my love! Told you you can count on me now show me I can count on you too!” Based on the previous conversation, I believe DOBBELMANN was referring to the fact MINOR VICTIM 1 had sent sexually

suggestive images, but had not yet sent sexually explicit images. MINOR VICTIM 1 sent an image of her breasts. DOBBELMANN continued insisting on more explicit images such as pictures of “you shaking that sexy ass and some brighter pix of your ass.. can barely see it.”

32. The chat between MINOR VICTIM 1 and DOBBELMANN continued for several days. All the while, DOBBELMANN requested sexually explicit images from MINOR VICTIM 1. DOBBELMANN sent the following messages:

- i. Oh I see... well get those little ones to bed and get naked for me soon babygirl! Please lemme see that sweet pussy too.. you dont gotta spread it open for me if your uncomfortable doing that on your period but still lemme see it please luv!
- ii. I'm in MN but got friends out in Ohio near you that I go visit and would love to meet up sometime I'm out there if ya wanna. Hurry and send me your pix and videos babygirl! I'm dying to see them all & all of your sexy naked fine ass beauty! 🍑😍🔥🔥😍🍑
- iii. ??? Your guy friend there with you now??? Hope you have fun and have some great sex for me to watch and enjoy as soon as you can possibly send me all the videos you take 4 me tonight! 🍑😍🍑😍🍑

- iv. 🍆🍆🍆🍆 cant wait to see all your sweet pussy%2C¹⁵ more of your sexy ass booty%2C incredible titties and all of your super sexy totally bare naked beauty babygirl! 🍑😍🔥🔥😍🍑
- v. Will you please take and send me some sexy naked pictures and hot and steamy videos showing off all of your sexy totally bare naked beautiful body and that sweet wet pussy that I'd love to take control of in my mouth and those incredible titties and of you dancin naked for me%2C shakin & twerkin your super sexy totally bare ass naked booty for me to see too please my love!!!?????!! 🍑🔥🔥🍑
- vi. Stop what your doing and go in the bathroom right now and show your awesomedaddy your sweet sexy pussy that I get to punish with the most intense pure pleasures very soon babygirl!

33. On or about May 1, 2020, DOBBELMANN request a naked video chat with MINOR VICTIM 1. MINOR VICTIM 1 wrote, "I love food and you want my body so let's make a deal." DOBBELMANN replied, "I was already planning to offer to get you food once you really got on here naked with me on video chat you just gotta stop waisting time & get naked on here now." MINOR VICTIM 1 reported that she took pictures of herself

¹⁵ I have included many of the messages as they appear in the Snap, Inc. records. Some of the characters (punctuation or emojis) do not render properly when taken from the application and placed in a text format. These improperly rendered characters appear in the records as ASCII codes. This code, for example, represents a comma.

and her fifteen year old cousin. DOBBELMANN demanded, “Send all the pictures/videos you took and send your food order at the end.” MINOR VICTIM 1 then sent an image file identified as “chat~media_v4~2020-05-01-20-32-42UTC~[MINOR VICTIM 1’s account ID]~iliverichously~saved~b~EiQSFUVTQTIwYzU2WIVEelBrS1A5ZFNmNxoAGgAyAXxIAIAEYAE~v4.jpeg.” The file is an image depicting the anus and vagina of an individual purported to be MINOR VICTIM 1. DOBBELMANN later sent a screenshot of a food order totaling \$18.07.

34. DOBBELMANN’s interaction continued with MINOR VICTIM 1 for several months. On or about July 31, 2020, DOBBELMANN sent the following image to MINOR VICTIM 1:



Based on my investigation, including review of images in other accounts and government records, I am aware that the person depicted is very likely DOBBELMANN.

35. I am aware from log data and the context of chat messages that additional images were sent to DOBBELMANN in the form of “snaps” which disappear after a set amount of time and are not recoverable unless screenshotted by one of the participants.

MINOR VICTIM 2

36. On or about September 13, 2020, DOBBELMANN “added” MINOR VICTIM 2 on Snapchat. DOBBELMANN explained why he contacted MINOR VICTIM 2:

🔞😄😄 Hey your wellcum My Super Sexy Savage Baddie & Beautiful Boujee Babygirl!! WHAT ARE YOU UP TO TODAY???😄😄🔞🔞 I WOULD REALLY love to talk to you more and get to know eachother well while we have great fun together e/send me lots of sēxy pictures/videos of you showing øff both your gorgeous face as well as much of your bōdy's truly very høtt & sēxy bårē nākēd beauty as you possible can for me either here in my DM or on snap%2C ig%2C cell etc. If you would at least be nice enough to just send AT LEAST A FEW%2C PLEASE!!!%2C THAT WOULD BE TOTTAL AWESOME!Im not shy to show you anything you wanna see of me too baby so ask to see everything u desire!🔞 I hope to hear back from you and be able to see much more of you&your sēxy bare skin beauty very soon!😄👤😄 You can HMU hēre as well as on Duo&my cell#(both)@1(XXX)XXX-2498andSnapchat & IG (Both)@iliverichously [...] You think you can handle all 10 inches of my awesome Rock hard cock that I got here for you to enjoy anytime and anyway you desire babygirl?🔞😄😄😄🙏😄😄😄🔞

37. As with MINOR VICTIM 1, DOBBELMANN sent dozens of messages to MINOR VICTIM 2 asking for sexually explicit images. DOBBELMANN also sent several pictures of his penis to MINOR VICTIM 2. MINOR VICTIM 2’s age is not discussed in the chat, but I am aware from school records that MINOR VICTIM 2’s date of birth is XX/XX/2008. MINOR VICTIM 2 was enrolled in a California middle school at the time of this interaction.

38. On or about October 30, 2020,—at DOBBELMANN’s direction—Minor 2 sent a computer file identified as, “chat~media_v4~2020-10-30-21-28-19UTC~[MINOR VICTIM 2’s account

ID]~iliverichously~saved~b~EiQSFXRqUXJtZUdHV2RkcGpZcGpVRW9iVxoAGgAyAQFIA1AEYAE~v4.jpeg” The file is an image depicting the anus and vagina of an individual purported to be MINOR VICTIM 2.

39. I am aware from evidence gathered pursuant to a search warrant on one of DOBBELMANN’s email accounts and publicly available postings on social media sites that DOBBELMANN continued interacting with MINOR VICTIM 2 after the Snapchat records end. DOBBELMANN referred to MINOR VICTIM 2 as his girlfriend, sent her lingerie, and researched abortion providers in the vicinity of MINOR VICTIM 2’s residence.

MINOR VICTIM 4

40. Evidence obtained in DOBBELMANN’s Snapchat account shows DOBBELMANN sent thousands of images of himself holding his penis, masturbating, or engaged in sex acts with presumed adults to dozens of minors. For example, on or about August 10, 2020, DOBBELMANN had a conversation with MINOR VICTIM 4 wherein MINOR VICTIM 4 told DOBBELMANN she was eleven no fewer than three times. DOBBELMANN claimed to be 25. Several hours later on or about August 11, 2020, DOBBELMANN sent VICTIM 4 an image file of his naked penis, identified as chat~media_v4~2020-08-11-12-46-28UTC~iliverichously~[MINOR VICTIM 4’s account

ID]~saved~b~EiQSFUFiME9GWXhHZ290ODBIU2dheGVpeRoAGgAyAQRIA1AEYAE~v4, and wrote:

This is me Right Now thinking about how incredible it would feel having my rock hard cock sliding deep inside you with your smooth sweet tight wet pussy wrapped around my hard cock caressing every inch of it as I slide it all the way deep inside yuh ou for the first time ad pause for a minute staying inside you as I kiss from your lips down your neck and to each of your sexy titties squeezed firmly in my hands as I kiss & lick all over each one sucking your yummy nipples inside my mouth as I then continue to slide in&out a lil faster and faster till I'm thrusting my cock in &out over&over till your erupting in intense orgasmic pleasures surging thru your entire body and you feel my cock explode deep inside you instantly filling up with my huge load if cum & it gushes out your pussy from around my cock still inside your throbbing & pulsating pussy for the first time...

ADDITIONAL VICTIMS LIKELY

41. Victim identification efforts are ongoing. Based on the evidence contained in the above-mentioned accounts, I believe there will be more victims in this case. Additionally, based on evidence developed to date, I believe there are additional accounts containing evidence of additional violations.

CONCLUSION


42. I therefore submit there is probable cause as charged in the proposed Criminal Complaint that NATHAN MILLER DOBBELMANN, in the District of Minnesota and elsewhere, attempted to and did employ, use, persuade, induce, entice, and coerce minors to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted to him over the internet, all in violation of 18 U.S.C. § 2251(a) and (e).

43. I submit there is probable cause as charged in the proposed Criminal Complaint that NATHAN MILLER DOBBELMANN, in the District of Minnesota and elsewhere, attempted to and did knowingly distribute a visual depiction of a minor engaged in sexually explicit conduct using a means or facility of interstate commerce, all in violation of 18 U.S.C. § 2252(a)(2) and (b)(1).

44. I submit there is probable cause as charged in the proposed Criminal Complaint that NATHAN MILLER DOBBELMANN, in the District of Minnesota and elsewhere, knowingly attempted to and did transfer an obscene matter to another individual who had not attained the age of 16 years, knowing that such other individual had not attained the age of 16 years, all in violation of 18 U.S.C. § 1470.

45. Finally, I submit there is probable cause as charged in the proposed Criminal Complaint that at all times relevant to the proposed Criminal Complaint, NATHAN MILLER DOBBELMANN was a person required by Federal or other law to register as a sex offender and did commit an enumerated felony offense involving a minor, all in violation of 18 U.S.C. § 2260A.

46. Accordingly, I request that a warrant be issued for the arrest of NATHAN MILLER DOBBELMANN that he may be brought before this Court.



Special Agent Matthew Vogel
United States Department of Justice
Federal Bureau of Investigation

SUBSCRIBED and SWORN before me
by reliable electronic means (Zoom and
email) pursuant to Fed. R. Crim. P. 41(d)(3)
on March 24, 2020



THE HONORABLE DAVID T. SCHULTZ
UNITED STATES MAGISTRATE JUDGE